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Attorneys for Defendants
 AMERICAN EXPRESS TRAVEL RELATED SERVICES
 COMPANY, INC., AMERICAN EXPRESS CENTURION BANK,
 and AMERICAN EXPRESS BANK, FSB

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND BRANCH

HEIDI PICKMAN, ON HER OWN BEHALF,)	Case No. C 11 03610 JSC
ON BEHALF OF THOSE SIMILARLY)	
SITUATED, AND ON BEHALF OF THE)	[Assigned to the Hon. Jacqueline Scott Corley]
GENERAL PUBLIC OF THE STATE OF)	
CALIFORNIA,)	STIPULATION AND <u>PROPOSED</u>
)	ORDER EXTENDING TIME TO
Plaintiff,)	RESPOND TO FIRST AMENDED CLASS
)	ACTION COMPLAINT
vs.)	
)	
AMERICAN EXPRESS TRAVEL RELATED)	
SERVICES, INC., AMERICAN EXPRESS)	
CENTURION BANK, AND AMERICAN)	
EXPRESS BANK, FSB)	
)	
Defendants.)	

STIPULATION

WHEREAS, on June 3, 2011, plaintiff Heidi Pickman ("Plaintiff") filed a Class Action Complaint in the Superior Court for the County of Alameda (the "Action");

WHEREAS, on July 13, 2011, Plaintiff filed a First Amended Complaint (the "First Amended Complaint") in the Superior Court for the County of Alameda.

WHEREAS, on July 22, 2011, defendants American Express Travel Related Services Company, Inc., American Express Centurion Bank, and American Express Bank, FSB (collectively "Defendants") removed the Action to this Court;

WHEREAS, Defendants' response to the First Amended Complaint currently is due on or before July 29, 2011;

WHEREAS, Plaintiff may move to remand this Action to state court up to and including at least August 24, 2011, pursuant to 28 U.C.S. §1447(c), Fed.R.Civ.P., Rules 6(a) and 5(b), and agreement of the Parties without further leave of the Court and Plaintiff anticipates filing such a motion to remand;

WHEREAS, to coordinate the filing of Plaintiff's motion to remand with Defendants' response to the First Amended Complaint, the parties have agreed to a brief extension of the time for Defendants to answer or otherwise respond to the First Amended Complaint;

WHEREAS, pursuant to Local Rule 6-1(a), parties may agree to an extension of time within which to answer or otherwise respond to a complaint, provided the change will not alter the date of any event or any deadline already fixed by Court order;

WHEREAS, the extension proposed herein will not alter the date of any event or any deadline already fixed by Court order;

WHEREAS, no previous extensions have been requested; and

WHEREAS, this Stipulation is made in good faith and not for purposes of delay.

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendants shall respond, whether in this Court or the state Court, to the First Amended Complaint within seven (7) days of this Court's Order being entered on Plaintiff's

1 anticipated Motion to Remand, or by no later than August 31, 2011, should no such motion be filed
2 by Plaintiff or the time otherwise extended by further order of the Court.

3 IT IS SO STIPULATED.

4
5 Dated: July 28, 2011

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND
STEPHEN J. NEWMAN
JIAE MOON

8
9 By: 

Stephen J. Newman

10
11 Attorneys for Defendants
12 AMERICAN EXPRESS TRAVEL
13 RELATED SERVICES COMPANY, INC.,
14 AMERICAN EXPRESS CENTURION
15 BANK, and AMERICAN EXPRESS BANK,
16 FSB

17
18 Dated: July 28, 2011

WEEMS LAW OFFICES
MARGARET MULLINS WEEMS
ROBERT C. WEEMS

19 By: 

Robert C. Weems

20
21 Attorneys for Plaintiff
22 HEIDI PICKMAN

23 **[PROPOSED] ORDER**

24 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

25
26 Dated: 7-29-11


HON. JACQUELINE SCOTT CORLEY